



1013425

April 19, 2007

BY FEDERAL EXPRESS
FOR NEXT DAY DELIVERY

Mr. Bud Smith
Director, Environmental Control
Wheeling Pittsburgh Steel Corp.
1134 Market Street
Wheeling, WV-26003
EPA ID No: OHD010448231

Re: Request for Information and Preliminary Assessment/Visual Site Inspection of the
Wheeling Pittsburgh Steel Corporation – Martins Ferry Plant, Martins Ferry, Ohio

Dear Mr. Smith:

Pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 United States Code (USC) §6927, and as part of a nationwide inventory and screening of hazardous waste management sites and facilities, the U.S. Environmental Protection Agency (EPA) has initiated a Preliminary Assessment/Visual Site Inspection (PA/VSI) of the Wheeling Pittsburgh Steel Corporation (WPSC) facility located at 1001 Main Street in Martins Ferry, Ohio (the Martins Ferry facility). PA/VSIs, which are performed on sites listed in the RCRA Information Database, typically include the review of documents and activities, a physical “walk-through” (i.e., VSI) of the site and its immediate environs, and interviews of site representatives and employees. The PA/VSI is designed to distinguish between sites that pose little or no threat to human health and the environment, and sites that require further investigation to make such a determination. The PA/VSI also identifies sites requiring assessment for possible emergency response actions.

Booz Allen Hamilton (Booz Allen) is currently under contract with EPA and will be assisting with the Martins Ferry PA/VSI. As part of the PA/VSI, EPA and Booz Allen will conduct a two-day site visit of the Martins Ferry facility **beginning on April 25, 2007, at approximately 8:30 AM**. EPA counsel does not intend to participate unless WPSC’s counsel participates. Please note that, while the site visit is anticipated to require two days, a third day should be reserved in the event additional information is needed. This site visit will include both a site tour and a review of documents. Upon arrival at the Martins Ferry facility, EPA and Booz Allen representatives will take photographs and collect information about the site which will be incorporated into the PA/VSI Report. As part of the site tour, EPA and Booz Allen representatives will request to meet with Martins Ferry facility representatives to review and discuss pertinent information. Pursuant to Section 3007 of RCRA, EPA hereby requests that WPSC make pertinent information available to EPA and Booz Allen at the time of the above-

referenced facility visit including, but not necessarily limited to, documentation relevant to the issues outlined on Attachments 1 and 2. EPA believes that a large part of the information requested may be readily available at the Martins Ferry facility.

Compliance with this request for information is mandatory. Please be advised that under Section 3008 of RCRA, failure to provide the information and documents required by this letter may result in an order requiring compliance, an order assessing an administrative penalty, or a civil action for appropriate relief. Section 3008 of RCRA and 40 Code of Federal Regulations (CFR) Part 19 provide for the assessment of a civil penalty of \$27,500 per day for each violation of RCRA. In addition, Section 3008(d) of RCRA provides criminal penalties for knowingly making any false material statement in, or omitting material information from, any report required under RCRA. Additionally, 18 USC §1001 provides criminal penalties for knowingly and willfully making any materially false, fictitious, or fraudulent statement or representation.

Nothing herein is meant to prevent or limit the United States from using any of the information provided by WPSC in any administrative, civil, or criminal proceedings.

This request for information is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 USC §§3502(3), 3507, 3512, and 3518(c)(1) [see also 5 CFR §§1320.3(c), 1320.4, and 1320.6(a)]. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons [see also 44 USC §3502(4) & (11); 5 CFR §§1320.4 and 1320.6(a)].

Please feel free to invite anyone who can provide any of the information requested by this letter to the upcoming site visit. If you have any questions regarding this matter, please contact me at (312) 886-6181. Thank you for your cooperation in this matter.

Sincerely,



Tammy Moore
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604-3507
moore.tammy@epa.gov

Attachments

cc: Michele Benchouk, Booz Allen Hamilton
Kenneth Komoroski, Esq.
Thomas Williams, Esq.

Attachment 1

EPA Requested Information

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Facility
1001 Main Street
Martins Ferry, Ohio**

General Instructions:

This information request applies to all information related to the Wheeling Pittsburgh Steel Martins Ferry facility that is in Wheeling Pittsburgh Steel Corporation's (WPSC) or its representatives' (e.g., attorneys, consultants, agents, employees) possession, custody, or control. Nothing herein is meant to limit the scope of this information request only to information or documents physically present at the WPSC facility located at 1001 Main Street, Martins Ferry, Ohio.

The scope of this request also includes all information and documents independently developed or obtained by research on the part of WPSC, its attorneys, its consultants, its agents, or its employees (e.g., internal facility analyses, memoranda, or reports related to the requested information).

"And as well as or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information that might otherwise be construed to be outside its scope.

WPSC's response must be signed by an authorized and responsible corporate official of WPSC.

"Facility" shall be construed to mean all property, owned or leased, currently or historically associated with or involved in operations at the WPSC facility located at 1001 Main Street in Martins Ferry, Ohio.

General

1. Provide an indication of the total acreage of the Martins Ferry facility, specifically identifying any property parcels transferred or acquired during the facility's operating lifetime.
2. Provide a topographic map indicating the ground surface elevation across the Martins Ferry facility (in feet above mean sea level).

3. Provide the names, distances, directions, and street addresses of the residences, schools, hospitals, and natural preserves (e.g., city, state or national parks) nearest to the Martins Ferry facility.
4. Provide a brief description of all current and past production processes conducted at the Martins Ferry facility. Include simplified process flow diagrams for the overall facility processing and each major process area.
5. Provide a list of all past and present solid and hazardous wastes generated at the Martins Ferry facility. Provide a list of all determinations, made by or on behalf of WPSC, supporting the conclusion that a particular solid waste generated at the facility does not constitute a hazardous waste.
6. Provide a description of all past and present solid and hazardous waste management practices at the Martins Ferry facility, including on-site accumulation and arrangements for off-site disposal. Provide specific details on any materials that the facility reuses, recycles, or sends off site for recycling or reclamation.
7. Provide site plans, photographs, facility maps, and historical aerial photographs depicting locations of all historical and current buildings, waste stockpile areas, wastewater treatment operations, drainage routes, wells, solid and hazardous waste management units, underground and aboveground storage tanks, spill areas, and any other relevant features.
8. Provide a description of historical and current ownership and operational history of the Martins Ferry facility.
9. Provide a list of all Federal, State, and local permits held presently or in the past by the Martins Ferry facility including the permit number, issuance, and expiration dates. Also, describe any occurrence of noncompliance with these permits.
10. Describe any environmental or public health regulatory or enforcement agency involvement at the Martins Ferry facility.
11. Include historic and current maps, lists, and descriptions of all production areas, waste accumulation areas (including satellite accumulation areas), loading areas, painting areas, equipment maintenance shops, equipment storage areas (including equipment laydown or graveyard areas), wastewater treatment units, and other relevant areas. Please include a starting date of operation for each unit and production area, along with dates of cessation where applicable.
12. Provide a description and map of historical and current storm water drains, infrastructure, and discharge points located at the Martins Ferry facility. Identify flood prone areas on the map and indicate any portions of the facility that may be located within the 100-year flood plain, as defined by the Federal Emergency Management Agency.

13. Provide a list of chemical storage or dispensary locations at the Martins Ferry facility, as well as a list of the chemical products managed in those locations. Any details on releases (e.g., leakage, drippage, spills) from these areas should also be provided, even if the releases were associated with product materials.

Waste Management Areas/Units

14. For each area and/or unit identified in the preliminary list of solid waste management units (SWMUs) and areas of concern (AOCs) in Attachment 2, or for any other waste management unit historically or currently located at the Martins Ferry facility, describe the: (i) location and function; (ii) size, volume, and capacity; (iii) physical integrity; (iv) containment or other pollution control features; (v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure; (vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit; ~~(vii) associated spill or release history and spill or release control; (viii) information on~~ the nature and extent of contamination (including sampling data) in the vicinity of the area or unit, and (ix) remedial actions performed to clean up these areas. Specific references for the requested information should be cited as in Attachment 3, and copies should be provided during the site visit.
15. Provide a list and description of all historical, current, or planned remedial actions to address spills or releases associated with the Martins Ferry facility. Include a map, list, and description of all impact areas in soil, groundwater, surface water, and sediment. Include a map, list, and description of all soil/sediment excavations and treatment operations, groundwater remediation, or other corrective measures that have occurred at the facility. Identify the location of each of these areas on a map, along with specific sampling locations and monitoring wells. Closure documentation and confirmatory sampling results (including soil, groundwater, surface water, sediment, and wipe samples, as appropriate) should be provided for noted investigation and closure activities at the preliminary SWMUs and AOCs. Particular detail should be provided to support the assertion in Reference 26 (Attachment 3) that petroleum-based contamination in groundwater is naturally attenuating. The current status of groundwater remediation should be discussed, including the frequency and extent of the bailing and monitoring program, and plans to install soil vapor extraction and air sparging operations (as mentioned in Reference 21 in Attachment 3).
16. Provide a list, description, and map identifying the location of all sumps and drains located at the Martins Ferry facility associated with storage, treatment, disposal, loading and unloading of hazardous materials. The response should also clarify the location and historical/current usage and status of the "TFS sump" mentioned in Reference 16 (Attachment 3).
17. Provide a list of all spills or releases of chemicals, hazardous materials, and/or wastes (including items identified during facility- or government-led inspections) that have occurred at or adjacent to the Martins Ferry facility throughout its operating life. For each spill or release, include information on the location and date of the spill or release,

types and amounts of material spilled or released, the facility's response to the spill or release (including the preparation of any internal facility analysis, memorandum, or report relating to the spill or release; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results), and any regulatory agency response to the spill or release. Whenever possible, the source of the spill should also be identified. For example, although Reference 9 (Attachment 3) indicates that hydrochloric acid had been released to concrete and debris, no detail on the source of the spill was noted. In addition, Reference 30 appears to incorrectly identify the source of hydrochloric acid associated with AOC 2; contents of the reported source tank (listed in Reference 4) do not match the spilled material.

18. Provide information (constituents involved, amount, date, and actions taken) concerning all releases or spills that have occurred and impacted the Martins Ferry facility's storm water system.
19. According to Reference 47, USEPA was satisfied with WPSC's response to closure of the ARCO scrubber area (SWMU 17). Please provide a copy of written documentation indicating such approval, as it was not located in the file materials available during the PA review.

Storm Water/Wastewater Systems

20. For each area and/or unit identified in the Preliminary SWMU and AOC list in Attachment 2, or for any other storm water and National Pollutant Discharge Elimination System (NPDES)-permitted or non-NPDES permitted wastewater treatment systems historically or currently operated at the facility, describe the: (i) location and function; (ii) size, volume, and capacity; (iii) physical integrity; (iv) containment or other pollution control features; (v) date of construction, operation, cessation of operation, abandonment, and approved closure; (vi) types and amounts of materials stored, treated, managed, or disposed in the area and/or unit; (vii) associated spill or release history and spill or release control; (viii) information on the nature and extent of contamination (including sampling data) in the vicinity of the area or unit, and (ix) remedial actions performed to clean up these areas.
21. Provide updated detail on current status and investigation of the old buried clay pipeline from the acid and alkali tank to the WWTP's concrete holding pit (as discussed in Reference 44).
22. Provide an update as to the status of sediment removal from the Martins Ferry facility sewer system (as proposed in Reference 46), disposition of removed sediments, and any effect the removal action has had on exceedances of NPDES permit limits at Outfalls 001 and 002.

Soil

23. Provide a detailed description (including maps) of the history of any closure activities

associated with any units identified in the attached preliminary SWMU/AOC list, or units that were historically or are currently operating at the facility where soil (and possibly other media) have been impacted by contamination. Provide information concerning the implementation of the approved closure plans and/or corrective action. Dates of implementation should also be provided. Provide the most recent soil sampling data associated with any site-related remediation activities.

24. According to the WPSC letter cited as Reference 3 in Attachment 3, a background soil sample was collected from SWMU 12 as part of corrective action implemented in early 1989. It is unclear whether this sample was a background sample (as reference in the cited letter) which would have been collected from some other presumably unimpacted portion of the facility for comparison. The letter of the text appears to indicate that this sample was actually a confirmation soil sample collected beneath the excavation area. Provide additional detail as to the location from which this sample was collected, and any other means used to verify that contamination associated with the sludge release was satisfactorily remediated both laterally and vertically.
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Air

25. Given the reported exceedances in emissions from the baghouse, provide details on the potential for deposition of dust on the WPSC property and surrounding areas, as well as risks identified with respect to such deposition.

Groundwater

26. Provide a list, description, and map identifying the location of all groundwater supply and monitoring wells located at the Martins Ferry facility and on adjacent properties, and all well surveys that have been completed. Provide a list of all abandoned wells located on site and the reason for abandonment.
27. Provide the most recent groundwater monitoring data for all monitoring wells at or adjacent to the Martins Ferry facility. Identify the location of monitoring wells that are currently being sampled on a map. City of Martins Ferry Municipal Water Authority wells should also be noted on the map. Additionally, provide a summary of historic monitoring results for all wells that are currently in use or that have been abandoned.
28. Provide a geologic cross-section diagram for the Martins Ferry facility.
29. Provide the most recent water level data and/or groundwater contour maps for the Martins Ferry facility, along with information on any seasonal or historical variations in the groundwater elevations.
30. Provide information on any Martins Ferry facility procedures used to identify and close unused or abandoned wells and the history of any wells that are currently operating or have been closed on site.

31. Provide any available data collected from the City of Martins Ferry Municipal Water Authority wells to document the lack of site-related impacts.
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Attachment 2

Preliminary List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Facility
1001 Main Street
Martins Ferry, Ohio**

Unit	Description and Location	Key References
SWMU 1	Former Plant No. 1 - Pickle Rinse Tanks - Wastewater Sewer Lines	1, 11, 23, 47
	- Underground Covered Lift Station - Overhead Piping to Plant No. 2 Sewers - Hazardous Waste Storage Area	
SWMU 2	Plant No. 2 - Spent Pickle Liquor/Rinsewater Receiving Tank - Wastewater Sewer Lines to WWTP - Paint/Solvent Waste Accumulation Areas - Spent Chromate Solution Holding Tanks - Zinc Waste Storage Area on East Side - Secondary D007 Chemwaste, Concrete, and Asbestos Storage Area	1, 4, 9, 10, 23, 27, 50
SWMU 3	Wastewater Treatment Plant - Entry Holding Sump - Neutralization/Clarifier/Dewatering Units - Dewatered Sludge Storage and Loading Area - ST-5, Solid Lime Storage Tank - Storage Area (polymer, defoamer)	1, 2, 4, 11, 23
SWMU 4	ST-1 and ST-2, Hydrochloric Acid Tanks	4, 23
SWMU 5	ST-3, Waste Oil Storage Area	4, 11, 23, 30, 31, 38
SWMU 6	ST-4, Zinc Ammonium Chloride Tank	4, 23
SWMU 7	Fork Lift Fueling Station and Tank ST-6 (Gasoline UST at Building 102)	4, 11, 23
SWMU 8	ST-7 through ST-10, Boiler House Fuel Oil #2 Storage Tanks	23, 39
SWMU 9	Oil House	4, 23, 41, 42
SWMU 10	Gasoline and Diesel Fuel USTs at Garage	4
SWMU 11	Acid and Alkali Waste Storage Area	18, 19, 23, 27, 28, 32, 44
SWMU 12	Sludge Disposal Area Behind Facility	3, 5
SWMU 13	ChemTreat Waste Accumulation and Spill Area at Drum Storage Facility	7, 8, 9
SWMU 14	D007 ChemTreat Waste Accumulation Shed Behind Main Office	8
SWMU 17	New Designated ChemTreat Waste Accumulation Area and Satellite Accumulation Areas	27
SWMU 18	Paint Waste Storage Area (also known as the Former Waste Drum Storage Area)	14, 15, 16, 17, 22, 23
SWMU 19	Scrap Yard North of Plant No. 1 (also known as the ARCO Waste Storage Area or ARCO Scrubber Area)	28, 29, 30, 31, 34, 38, 41, 42, 45, 47, 48
SWMU 20	Container Storage Area Between WWTP and Ohio River	24, 25

Unit	Description and Location	Key References
SWMU 21	Former Coal Yard Adjacent to Old Boilerhouse Silo and Coal Pile Near Ohio River Riverbank	13, 21, 26
SWMU 22	Ohio River Discharges (NPDES-Permitted Outfalls 001 through 005) and Oil in Outfall 001 Sump	13, 20, 21, 23, 26, 33, 35, 36, 40, 46
SWMU 23	New Used Oil Container Storage Area	41
SWMU 24	Fork Lift Maintenance Shop	23
SWMU 25	Roof Shop Area	49
SWMU 26	Unidentified Accumulation Area for Broken Fluorescent Bulbs and Mercury Wastes	28
AOC 1	Outdoor Hydrochloric Acid Spill Area	9
AOC 2	"Hydrochloric Acid" Spill Area on Mill Floor	4, 23, 30, 31
AOC 3	Baghouse Dust Illegal Disposal Area	37, 39
AOC 4	Contaminated Groundwater and Free Product Hydrocarbon Associated with Gasoline UST	12, 21, 26, 42
AOC 5	Hazardous Waste Disposal Incident at Rohrig Brothers Landfill, North Fork Location, Ohio County, West Virginia	6, 10
AOC 6	Staining Beneath ChemTreat Process Line	42, 43

Attachment 3

Preliminary Reference List

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Plant
1001 Main Street
Martins Ferry, Ohio**

1. Hazardous Waste Management Manual. Prepared by Chester Engineers. Dated March 15, 1982.
2. Letter from Michael Moschell, OEPA, to W. R. Samples, WPSC, re: Violations at WWTP Storage Area. Dated February 23, 1983.

3. Letter from Michael Moschell, OEPA, to Nancy Ray, WPSC, re: Sludge Disposal Area Cleanup Sampling. Dated December 9, 1988.
4. Martins Ferry Plant Spill Prevention, Control, and Countermeasures Plan. Prepared by WPSC. Dated March 1989.
5. Letter from Nancy Ray, WPSC, to Michael Moschell, OEPA, re: Soil Sampling Results from Sludge Disposal Area Cleanup. Dated March 13, 1989.
6. Letter from Martin Stephenson, WPSC, to Chief Deputy Shamblin, Ohio County of West Virginia Sheriff's Department, re: Hazardous Waste Disposal Incident. Dated December 13, 1990.
7. Letter from Martin Stephenson, WPSC, to Michael Moschell, OEPA, re: Disposal of D007 Hazardous Waste Solid. Dated January 22, 1991.
8. Letter from Cindy Pelley, OEPA, to Martin Stephenson, WPSC, re: January 31, 1991 Compliance Evaluation Inspection (CEI). Dated March 7, 1991.
9. Letter from Martin Stephenson, WPSC, to Cindy Pelley, OEPA, re: RCRA CEI Report (January 31, 1991 Inspection). Dated April 10, 1991.
10. Letter from Martin Stephenson, WPSC, to Cindy Pelley, OEPA, re: Hazardous Waste Issues. Dated May 20, 1991.
11. Martins Ferry Plant Spill Prevention, Control, and Countermeasures Plan. Prepared by WPSC. Revised March 1992.
12. Martins Ferry Plant NPDES Permit Application (Stormwater). Prepared by WPSC. Dated September 28, 1992.

13. Letter from Abbot Stevenson, OEPA, to William Samples, WPSC, re: June 23-24, 1994 CSI. Dated September 14, 1994.
14. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 7-8, 1994 CEI. Dated October 14, 1994.
15. Letter from Lori Ann Clark, WPSC, to Richard Stewart, OEPA, re: Response to October 14, 1994 OEPA Letter. Dated November 16, 1994.
16. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 7-8, 1994 CEI. Dated January 11, 1995.
17. Drum Storage Area Generator Closure Plan. Prepared by Groundwater Technology, Inc. Dated July 24, 1995.
18. Letter from Thomas Webster, WPSC, to Richard Stewart, OEPA, re: September 27, 1995 Hazardous Waste Follow Up Inspection. Dated September 29, 1995.
19. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 27, 1995 Follow Up CEI. Dated October 11, 1995.
20. Letter from Abbot Stevenson, OEPA, to William Samples, WPSC, re: May 7, 1996 CSI. Dated June 27, 1996.
21. Letter from William Samples, WPSC, to Abbot Stevenson, OEPA, re: Response to June 27, 1996 OEPA Letter. Dated July 22, 1996.
22. Letter from Mary Washko, Fluor Daniel GTI, to Tom Webster, WPSC, re: Closure of Drum Storage Area. Dated August 12, 1996.
23. Martins Ferry Plant Stormwater Pollution Prevention Plan. Prepared by Chester Engineers. Dated September 1996.
24. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: October 22, 1997 Container Storage Area. Dated November 17, 1997.
25. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: October 22, 1997 Inspection Response. Dated December 5, 1997.
26. Letter from Lisa Romito, WPSC, to Abbot Stevenson, OEPA, re: Response to September 4, 1998 CSI Letter. Dated September 25, 1998.
27. Martins Ferry Plant Hazardous Waste Generator Contingency Plan. Prepared by WPSC. Dated May 1999.

28. RCRA Hazardous Waste Generator CEI Checklist. Prepared by OEPA. Dated June 8-11, 1999.
 29. Letter from Bud Smith, WPSC, to John Shepler, USEPA, re: Multi-media Information Request Documents (3rd Submittal). Dated July 30, 1999.
 30. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: June 8-11, 1999 Multi-media Compliance Inspection. Dated August 26, 1999.
 31. Letter from Lisa Romito, WPSC, to Richard Stewart, OEPA, re: Response to August 26, 1999 Letter. Dated December 7, 1999.
 32. OEPA Email Correspondence between Richard Stewart and Jeff Mayhugh, re: WWTP Pit. Dated December 7, 1999.
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33. Letter from William Polomik, Jr., WPSC, to Abbot Stevenson, OEPA, re: Response to March 6, 2000 Correspondence. Dated April 4, 2000.
 34. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: June 8-11, 1999 Multi-media Compliance Inspection. Dated June 30, 2000.
 35. Letter from Todd Koget, WPSC, to Abbot Stevenson, OEPA, re: Wastewater Treatment Plant Exceedances. Dated March 21, 2001.
 36. Agenda from Settlement Meeting of Water Issues. Prepared by OEPA. Dated April 3, 2001.
 37. Baghouse Dust Illegal Disposal Incident Report. Prepared by National Response Center. Dated April 12, 2001.
 38. Letter from Patrick Smit, WPSC, to Richard Stewart, OEPA, re: Response to March 19, 2001 OEPA Letter. Dated April 20, 2001.
 39. Letter from John Rochotte, OEPA, to Patrick Smith, WPSC, re: Baghouse Dust Dumping Complaint. Dated May 8, 2001.
 40. Letter from Abbot Stevenson, OEPA, to Bud Smith, WPSC, re: July 11, 2001 CEI. Dated August 8, 2001.
 41. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated December 12, 2001.
 42. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to December 12, 2001 RCRA Inspection Letter. Dated April 19, 2002.

43. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated September 16, 2002.
 44. Letter from Abbot Stevenson, OEPA, to Bud Smith, WPSC, re: April 8, 2003 CEI. Dated April 18, 2003.
 45. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to May 27, 2003 RCRA Inspection Letter. Dated June 27, 2003.
 46. Letter from Bud Smith, WPSC, to Abbot Stevenson, OEPA, re: Sewer Manhole Sediment Sampling Results. Dated December 28, 2003.
 47. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to November 6, 2003 RCRA Inspection Letter. Dated March 12, 2004.
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48. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated April 6, 2004.
 49. Letter from John Rochotte, OEPA, to Pat Smith, WPSC, re: October 25, 2004 Compliance Inspection. Dated November 24, 2004.
 50. Sampling Report Prepared by John Rochotte, OEPA. Dated January 3, 2007.

April 5, 2007

Mr. Bud Smith
Director, Environmental Control
Wheeling Pittsburgh Steel Corp.
1134 Market Street
Wheeling, WV 26003
EPA ID No: OHD010448231

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Please feel free to invite anyone who can provide any of the information requested by this letter to the upcoming site visit. If you have any questions regarding this matter, please contact me at (312) 886-6181. Thank you for your cooperation in this matter.

Sincerely,

Tammy Moore
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, DE-9J
Chicago, Illinois 60604-3507
moore.tammy@epa.gov

Attachments

cc: Michele Benchouk, Booz Allen Hamilton

Attachment 1

EPA Requested Information

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Facility
1001 Main Street
Martins Ferry, Ohio**

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"And as well as or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information that might otherwise be construed to be outside its scope.

WPSC's response must be signed by an authorized and responsible corporate official of WPSC.

"Facility" shall be construed to mean all property, owned or leased, currently or historically associated with or involved in operations at the WPSC facility located at 1001 Main Street in Martins Ferry, Ohio.

General

1. Provide an indication of the total acreage of the facility, specifically identifying any property parcels transferred or acquired during the facility's operating lifetime.
2. Provide a topographic map indicating the ground surface elevation across the plant (in feet above mean sea level).
3. Provide the names, distances, directions, and street addresses of the residences, schools, hospitals, and natural preserves (e.g., city, state or national parks) nearest to the facility.

4. Provide a brief description of all current and past production processes conducted at the facility. Include simplified process flow diagrams for the overall facility processing and each major process area.
5. Provide a list of all past and present solid and hazardous wastes generated at the facility. Provide a list of all determinations, made by or on behalf of WPSC, supporting the conclusion that a particular solid waste generated at the facility does not constitute a hazardous waste.
6. Provide a description of all past and present solid and hazardous waste management practices at the facility, including on-site accumulation and arrangements for off-site disposal. Provide specific details on any materials that the facility reuses, recycles, or sends off site for recycling or reclamation.
7. Provide site plans, photographs, facility maps, and historical aerial photographs depicting locations of all historical and current buildings, waste stockpile areas, wastewater treatment operations, drainage routes, wells, solid and hazardous waste management units, underground and aboveground storage tanks, spill areas, and any other relevant features.
8. Provide a description of historical and current ownership and operational history of the facility.
9. Provide a list of all Federal, State, and local permits held presently or in the past by the facility including the permit number, issuance, and expiration dates. Also, describe any occurrence of noncompliance with these permits.
10. Describe any environmental or public health regulatory or enforcement agency involvement at the facility.
11. Include historic and current maps, lists, and descriptions of all production areas, waste accumulation areas (including satellite accumulation areas), loading areas, painting areas, equipment maintenance shops, equipment storage areas (including equipment laydown or graveyard areas), wastewater treatment units, and other relevant areas. Please include a starting date of operation for each unit and production area, along with dates of cessation where applicable.
12. Provide a description and map of historical and current storm water drains, infrastructure, and discharge points located at the facility. Identify flood prone areas on the map and indicate any portions of the facility that may be located within the 100-year flood plain, as defined by the Federal Emergency Management Agency.
13. Provide a list of chemical storage or dispensary locations at the facility, as well as a list of the chemical products managed in those locations. Any details on releases (e.g., leakage, drippage, spills) from these areas should also be provided, even if the releases were associated with product materials.

Waste Management Areas/Units

14. For each area and/or unit identified in the preliminary list of solid waste management units (SWMUs) and areas of concern (AOCs) in Attachment 2, or for any other waste management unit historically or currently located at the facility, describe the: (i) location and function; (ii) size, volume, and capacity; (iii) physical integrity; (iv) containment or other pollution control features; (v) date of construction, operation, cessation of operation, abandonment, and approved RCRA closure; (vi) types and amounts of materials stored, treated, managed, and/or disposed of in the area and/or unit; (vii) associated spill or release history and spill or release control; (viii) information on the nature and extent of contamination (including sampling data) in the vicinity of the area or unit, and (ix) remedial actions performed to clean up these areas. Specific references for the requested information should be cited as in Attachment 3, and copies should be provided during the site visit.

15. Provide a list and description of all historical, current, or planned remedial actions to address spills or releases associated with the facility. Include a map, list, and description of all impact areas in soil, groundwater, surface water, and sediment. Include a map, list, and description of all soil/sediment excavations and treatment operations, groundwater remediation, or other corrective measures that have occurred at the facility. Identify the location of each of these areas on a map, along with specific sampling locations and monitoring wells. Closure documentation and confirmatory sampling results (including soil, groundwater, surface water, sediment, and wipe samples, as appropriate) should be provided for noted investigation and closure activities at the preliminary SWMUs and AOCs. Particular detail should be provided to support the assertion in Reference 26 (Attachment 3) that petroleum-based contamination in groundwater is naturally attenuating. The current status of groundwater remediation should be discussed, including the frequency and extent of the bailing and monitoring program, and plans to install soil vapor extraction and air sparging operations (as mentioned in Reference 21 in Attachment 3).
16. Provide a list, description, and map identifying the location of all sumps and drains located at the site associated with storage, treatment, disposal, loading and unloading of hazardous materials. The response should also clarify the location and historical/current usage and status of the "TFS sump" mentioned in Reference 16 (Attachment 3).
17. Provide a list of all spills or releases of chemicals, hazardous materials, and/or wastes (including items identified during facility- or government-led inspections) that have occurred at or adjacent to the facility throughout its operating life. For each spill or release, include information on the location and date of the spill or release, types and amounts of material spilled or released, the facility's response to the spill or release (including the preparation of any internal facility analysis, memorandum, or report relating to the spill or release; any notification or report provided to any regulatory agency; contaminated soil staging areas; and soil TCLP results), and any regulatory agency response to the spill or release. Whenever possible, the source of the spill should

also be identified. For example, although Reference 9 (Attachment 3) indicates that hydrochloric acid had been released to concrete and debris, no detail on the source of the spill was noted. In addition, Reference 30 appears to incorrectly identify the source of hydrochloric acid associated with AOC 2; contents of the reported source tank (listed in Reference 4) do not match the spilled material.

18. Provide information (constituents involved, amount, date, and actions taken) concerning all releases or spills that have occurred and impacted the facilities storm water system.
19. According to Reference 47, USEPA was satisfied with WPSC's response to closure of the ARCO scrubber area (SWMU 17). Please provide a copy of written documentation indicating such approval, as it was not located in the file materials available during the PA review.

Storm Water/Wastewater Systems

20. For each area and/or unit identified in the Preliminary SWMU and AOC list in Attachment 2, or for any other storm water and National Pollutant Discharge Elimination System (NPDES)-permitted or non-NPDES permitted wastewater treatment systems historically or currently operated at the facility, describe the: (i) location and function; (ii) size, volume, and capacity; (iii) physical integrity; (iv) containment or other pollution control features; (v) date of construction, operation, cessation of operation, abandonment, and approved closure; (vi) types and amounts of materials stored, treated, managed, or disposed in the area and/or unit; (vii) associated spill or release history and spill or release control; (viii) information on the nature and extent of contamination (including sampling data) in the vicinity of the area or unit, and (ix) remedial actions performed to clean up these areas.
21. Provide updated detail on current status and investigation of the old buried clay pipeline from the acid and alkali tank to the WWTP's concrete holding pit (as discussed in Reference 44).
22. Provide an update as to the status of sediment removal from the facility sewer system (as proposed in Reference 46), disposition of removed sediments, and any effect the removal action has had on exceedances of NPDES permit limits at Outfalls 001 and 002.

Soil

23. Provide a detailed description (including maps) of the history of any closure activities associated with any units identified in the attached preliminary SWMU/AOC list, or units that were historically or are currently operating at the facility where soil (and possibly other media) have been impacted by contamination. Provide information concerning the implementation of the approved closure plans and/or corrective action. Dates of implementation should also be provided. Provide the most recent soil sampling data associated with any site-related remediation activities.

24. According to the WPSC letter cited as Reference 3 in Attachment 3, a background soil sample was collected from SWMU 12 as part of corrective action implemented in early 1989. It is unclear whether this sample was a background sample (as reference in the cited letter) which would have been collected from some other presumably unimpacted portion of the facility for comparison. The letter of the text appears to indicate that this sample was actually a confirmation soil sample collected beneath the excavation area. Provide additional detail as to the location from which this sample was collected, and any other means used to verify that contamination associated with the sludge release was satisfactorily remediated both laterally and vertically.

Air

25. Given the reported exceedances in emissions from the baghouse, provide details on the potential for deposition of dust on the WPSC property and surrounding areas, as well as risks identified with respect to such deposition.

Groundwater

26. Provide a list, description, and map identifying the location of all groundwater supply and monitoring wells located at the facility and on adjacent properties, and all well surveys that have been completed. Provide a list of all abandoned wells located on site and the reason for abandonment.
27. Provide the most recent groundwater monitoring data for all monitoring wells at or adjacent to the facility. Identify the location of monitoring wells that are currently being sampled on a map. City of Martins Ferry Municipal Water Authority wells should also be noted on the map. Additionally, provide a summary of historic monitoring results for all wells that are currently in use or that have been abandoned.
28. Provide a geologic cross-section diagram for the facility.
29. Provide the most recent water level data and/or groundwater contour maps for the site, along with information on any seasonal or historical variations in the groundwater elevations.
30. Provide information on any facility procedures used to identify and close unused or abandoned wells and the history of any wells that are currently operating or have been closed on site.
31. Provide any available data collected from the City of Martins Ferry Municipal Water Authority wells to document the lack of site-related impacts.

Attachment 2

Preliminary List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Facility
1001 Main Street
Martins Ferry, Ohio**

Unit	Description and Location	Key References
SWMU 1	Former Plant No. 1 - Pickle Rinse Tanks - Wastewater Sewer Lines - Underground Covered Lift Station - Overhead Piping to Plant No. 2 Sewers - Hazardous Waste Storage Area	1, 11, 23, 47
SWMU 2	Plant No. 2 - Spent Pickle Liquor/Rinsewater Receiving Tank - Wastewater Sewer Lines to WWTP - Paint/Solvent Waste Accumulation Areas - Spent Chromate Solution Holding Tanks - Zinc Waste Storage Area on East Side - Secondary D007 Chemwaste, Concrete, and Asbestos Storage Area	1, 4, 9, 10, 23, 27, 50
SWMU 3	Wastewater Treatment Plant - Entry Holding Sump - Neutralization/Clarifier/Dewatering Units - Dewatered Sludge Storage and Loading Area - ST-5, Solid Lime Storage Tank - Storage Area (polymer, defoamer)	1, 2, 4, 11, 23
SWMU 4	ST-1 and ST-2, Hydrochloric Acid Tanks	4, 23
SWMU 5	ST-3, Waste Oil Storage Area	4, 11, 23, 30, 31, 38
SWMU 6	ST-4, Zinc Ammonium Chloride Tank	4, 23
SWMU 7	Fork Lift Fueling Station and Tank ST-6 (Gasoline UST at Building 102)	4, 11, 23
SWMU 8	ST-7 through ST-10, Boiler House Fuel Oil #2 Storage Tanks	23, 39
SWMU 9	Oil House	4, 23, 41, 42
SWMU 10	Gasoline and Diesel Fuel USTs at Garage	4
SWMU 11	Acid and Alkali Waste Storage Area	18, 19, 23, 27, 28, 32, 44
SWMU 12	Sludge Disposal Area Behind Facility	3, 5
SWMU 13	ChemTreat Waste Accumulation and Spill Area at Drum Storage Facility	7, 8, 9
SWMU 14	D007 ChemTreat Waste Accumulation Shed Behind Main Office	8
SWMU 17	New Designated ChemTreat Waste Accumulation Area and Satellite Accumulation Areas	27
SWMU 18	Paint Waste Storage Area (also known as the Former Waste Drum Storage Area)	14, 15, 16, 17, 22, 23
SWMU 19	Scrap Yard North of Plant No. 1 (also known as the ARCO Waste Storage Area or ARCO Scrubber Area)	28, 29, 30, 31, 34, 38, 41, 42, 45, 47, 48
SWMU 20	Container Storage Area Between WWTP and Ohio River	24, 25

Unit	Description and Location	Key References
SWMU 21	Former Coal Yard Adjacent to Old Boilerhouse Silo and Coal Pile Near Ohio River Riverbank	13, 21, 26
SWMU 22	Ohio River Discharges (NPDES-Permitted Outfalls 001 through 005) and Oil in Outfall 001 Sump	13, 20, 21, 23, 26, 33, 35, 36, 40, 46
SWMU 23	New Used Oil Container Storage Area	41
SWMU 24	Fork Lift Maintenance Shop	23
SWMU 25	Roof Shop Area	49
SWMU 26	Unidentified Accumulation Area for Broken Fluorescent Bulbs and Mercury Wastes	28
AOC 1	Outdoor Hydrochloric Acid Spill Area	9
AOC 2	"Hydrochloric Acid" Spill Area on Mill Floor	4, 23, 30, 31
AOC 3	Baghouse Dust Illegal Disposal Area	37, 39
AOC 4	Contaminated Groundwater and Free Product Hydrocarbon Associated with Gasoline UST	12, 21, 26, 42
AOC 5	Hazardous Waste Disposal Incident at Rohrig Brothers Landfill, North Fork Location, Ohio County, West Virginia	6, 10
AOC 6	Staining Beneath ChemTreat Process Line	42, 43

Attachment 3

Preliminary Reference List

**Wheeling Pittsburgh Steel Corporation
Martins Ferry Plant
1001 Main Street
Martins Ferry, Ohio**

1. Hazardous Waste Management Manual. Prepared by Chester Engineers. Dated March 15, 1982.
2. Letter from Michael Moschell, OEPA, to W. R. Samples, WPSC, re: Violations at WWTP Storage Area. Dated February 23, 1983.
3. Letter from Michael Moschell, OEPA, to Nancy Ray, WPSC, re: Sludge Disposal Area Cleanup Sampling. Dated December 9, 1988.
4. Martins Ferry Plant Spill Prevention, Control, and Countermeasures Plan. Prepared by WPSC. Dated March 1989.
5. Letter from Nancy Ray, WPSC, to Michael Moschell, OEPA, re: Soil Sampling Results from Sludge Disposal Area Cleanup. Dated March 13, 1989.
6. Letter from Martin Stephenson, WPSC, to Chief Deputy Shamblin, Ohio County of West Virginia Sheriff's Department, re: Hazardous Waste Disposal Incident. Dated December 13, 1990.
7. Letter from Martin Stephenson, WPSC, to Michael Moschell, OEPA, re: Disposal of D007 Hazardous Waste Solid. Dated January 22, 1991.
8. Letter from Cindy Pelley, OEPA, to Martin Stephenson, WPSC, re: January 31, 1991 Compliance Evaluation Inspection (CEI). Dated March 7, 1991.
9. Letter from Martin Stephenson, WPSC, to Cindy Pelley, OEPA, re: RCRA CEI Report (January 31, 1991 Inspection). Dated April 10, 1991.
10. Letter from Martin Stephenson, WPSC, to Cindy Pelley, OEPA, re: Hazardous Waste Issues. Dated May 20, 1991.
11. Martins Ferry Plant Spill Prevention, Control, and Countermeasures Plan. Prepared by WPSC. Revised March 1992.
12. Martins Ferry Plant NPDES Permit Application (Stormwater). Prepared by WPSC. Dated September 28, 1992.

13. Letter from Abbot Stevenson, OEPA, to William Samples, WPSC, re: June 23-24, 1994 CSI. Dated September 14, 1994.
 14. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 7-8, 1994 CEI. Dated October 14, 1994.
 15. Letter from Lori Ann Clark, WPSC, to Richard Stewart, OEPA, re: Response to October 14, 1994 OEPA Letter. Dated November 16, 1994.
 16. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 7-8, 1994 CEI. Dated January 11, 1995.
 17. Drum Storage Area Generator Closure Plan. Prepared by Groundwater Technology, Inc. Dated July 24, 1995.
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18. Letter from Thomas Webster, WPSC, to Richard Stewart, OEPA, re: September 27, 1995 Hazardous Waste Follow Up Inspection. Dated September 29, 1995.
 19. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: September 27, 1995 Follow Up CEI. Dated October 11, 1995.
 20. Letter from Abbot Stevenson, OEPA, to William Samples, WPSC, re: May 7, 1996 CSI. Dated June 27, 1996.
 21. Letter from William Samples, WPSC, to Abbot Stevenson, OEPA, re: Response to June 27, 1996 OEPA Letter. Dated July 22, 1996.
 22. Letter from Mary Washko, Fluor Daniel GTI, to Tom Webster, WPSC, re: Closure of Drum Storage Area. Dated August 12, 1996.
 23. Martins Ferry Plant Stormwater Pollution Prevention Plan. Prepared by Chester Engineers. Dated September 1996.
 24. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: October 22, 1997 Container Storage Area. Dated November 17, 1997.
 25. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: October 22, 1997 Inspection Response. Dated December 5, 1997.
 26. Letter from Lisa Romito, WPSC, to Abbot Stevenson, OEPA, re: Response to September 4, 1998 CSI Letter. Dated September 25, 1998.
 27. Martins Ferry Plant Hazardous Waste Generator Contingency Plan. Prepared by WPSC. Dated May 1999.

28. RCRA Hazardous Waste Generator CEI Checklist. Prepared by OEPA. Dated June 8-11, 1999.
29. Letter from Bud Smith, WPSC, to John Shepler, USEPA, re: Multi-media Information Request Documents (3rd Submittal). Dated July 30, 1999.
30. Letter from Richard Stewart, OEPA, to William Samples, WPSC, re: June 8-11, 1999 Multi-media Compliance Inspection. Dated August 26, 1999.
31. Letter from Lisa Romito, WPSC, to Richard Stewart, OEPA, re: Response to August 26, 1999 Letter. Dated December 7, 1999.
32. OEPA Email Correspondence between Richard Stewart and Jeff Mayhugh, re: WWTP Pit. Dated December 7, 1999.
33. Letter from William Polomik, Jr., WPSC, to Abbot Stevenson, OEPA, re: Response to March 6, 2000 Correspondence. Dated April 4, 2000.
34. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: June 8-11, 1999 Multi-media Compliance Inspection. Dated June 30, 2000.
35. Letter from Todd Koget, WPSC, to Abbot Stevenson, OEPA, re: Wastewater Treatment Plant Exceedances. Dated March 21, 2001.
36. Agenda from Settlement Meeting of Water Issues. Prepared by OEPA. Dated April 3, 2001.
37. Baghouse Dust Illegal Disposal Incident Report. Prepared by National Response Center. Dated April 12, 2001.
38. Letter from Patrick Smit, WPSC, to Richard Stewart, OEPA, re: Response to March 19, 2001 OEPA Letter. Dated April 20, 2001.
39. Letter from John Rochotte, OEPA, to Patrick Smith, WPSC, re: Baghouse Dust Dumping Complaint. Dated May 8, 2001.
40. Letter from Abbot Stevenson, OEPA, to Bud Smith, WPSC, re: July 11, 2001 CEI. Dated August 8, 2001.
41. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated December 12, 2001.
42. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to December 12, 2001 RCRA Inspection Letter. Dated April 19, 2002.

43. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated September 16, 2002.
44. Letter from Abbot Stevenson, OEPA, to Bud Smith, WPSC, re: April 8, 2003 CEI. Dated April 18, 2003.
45. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to May 27, 2003 RCRA Inspection Letter. Dated June 27, 2003.
46. Letter from Bud Smith, WPSC, to Abbot Stevenson, OEPA, re: Sewer Manhole Sediment Sampling Results. Dated December 28, 2003.
47. Letter from Patrick Smith, WPSC, to Richard Stewart, OEPA, re: Response to November 6, 2003 RCRA Inspection Letter. Dated March 12, 2004.

48. Letter from Richard Stewart, OEPA, to Bud Smith, WPSC, re: November 7 and 14, 2001 Compliance Inspection. Dated April 6, 2004.
49. Letter from John Rochotte, OEPA, to Pat Smith, WPSC, re: October 25, 2004 Compliance Inspection. Dated November 24, 2004.
50. Sampling Report Prepared by John Rochotte, OEPA. Dated January 3, 2007.